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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
20-CV-0163**

**AFRICAN CHILDREN -VICTIMS OF  
JEFFREY EPSTEIN'S SEX TRAFFICKING et al,**

Plaintiffs,

VS.

**JEFFREY EPSTEIN'S ESTATES, et al,**

Defendants

**MEMORANDUM IN SUPPORT OF MOTION FOR LEAVE TO FILE AMENDED  
COMPLAINT**

The Honorable Mr. Amar Gueye hereby requests that the U.S. Federal Court Southern District of New York restate the names of Plaintiffs as originally written by Mr. Gueye on August 29, 2019. Although Mr. Gueye is a proficient and well experienced American Legal Scholar, he is not a licensed practicing attorney to represent the African children, victims of Jeffrey Epstein's sex trafficking. In fact, the New York State Bar is one of the defendants in Gueye vs. U.S. Postal Services et al for denying Mr. Gueye the constitutional right to take the New York Bar Exam after payment of all fees. Furthermore, Mr. Gueye is not part of the class of victims in this case and never met Jeffrey Epstein in his life. As such, the court cannot conveniently consider Mr. Gueye as a Plaintiff in this case nor arbitrarily flip the coins by removing "AFRICAN CHILDREN -VICTIMS OF JEFFREY EPSTEIN'S SEX TRAFFICKING.

Pursuant to ARTICLE III.CIVIL APPEALS RULES: This rule, adopted pursuant to the authority given the Supreme Court by the judicial article effective January 1, 1964, former article VI, section 7, present article VI, section 16, prescribes the method of review of final judgments. The rule was primarily based upon and replaced former sections 74, 76(2), and 80 of the Civil Practice Act. The next to last sentence of the rule was intended to incorporate and restate the provisions of the last two sentences of former section 74(1) in accordance with supersedure of statutory provisions of Rule1.

I

### LEGAL FACTS OF THIS CASE

This case was written by Mr. Amar Gueye who spent months and years to research all the legal facts and evidence before drafting the complaint. Then Mr. Gueye sent the final draft to the New York Attorney General, Letitia James more than a year ago. Mrs. James wrote to Mr. Gueye and stated that she forwarded the case to the Clerk of Southern District of New York. Mr. Gueye later wrote to the clerk of Southern District of New York, Mrs. Ruby Krajick. Mrs. Krajick only sent Mr. Gueye the federal forms and the forma pauperis form to waive fees. Mr. Gueye amended the case last month and included the New York Attorney General and the Clerk of the Southern District of New York in the defendants for failing to timely file the case and to assign it to a legal counsel as requested by Mr. Gueye. Not only the court failed to timely process the case, now the court is committing violations of Federal Rule 50.U.S. Code Section 3093 and 18 U.S. Code Section 1028. Based on the courts flagrant decision to switch the names of Plaintiffs, the Southern District of New York has violated 5.U.S. Code 3331 of Oath of Office and therefore must be held accountable pursuant to 15 U.S. Code Section 1825 in the interest of justice.

### ABUSE OF POWER

Pursuant to the arbitrary order of Chief United States District Judge Colleen McMahon of the Southern District of New York, Mr. Gueye must pay for the filing fees of this case in order for the case to proceed. Mr. Gueye cannot pay for a case that is not his. This case represents the interests of poor African children victims of sex trafficking by wealthy American & European Pedophiles. First the case must be amended with the right name of Plaintiffs. After that, **if and possible** that Mr. Gueye can assist these African Children to pay for the filing fees, Mr. Gueye will be happy to pay only for the filing fees. Mr. Gueye is not the legal counsel nor a Plaintiff in this case and will not take the burden to finance this case although Mr. Gueye remains the author of the complaint and retains all the intellectual property rights.

But Mr. Gueye will not pay any additional court fees regarding this case because the U.S. Legal Justice System has enough funds to process and litigate similar cases as previously executed for white victims of rape, sex crimes and other violent crimes. Entities like the Legal Services Corporation, The Federal Pro bono Innovation Funds and the Civil Legal Aid Federal Funding Resources are just few of the many organizations that are established to resolve cases like the present case. In a judicial system fraught with racism, discrimination and denial of justice to the most vulnerable victims of the barbaric White Sex Crimes, Mr. Gueye, an American Muslim Citizen who is victim of decades of employment discrimination and denial of justice, finds the legal threats from Judge Colleen McMahon to dismiss case if he cannot pay the fees, to be highly reflective of systemic racism in the United States Judicial system. Additionally, Judge Colleen McMahon was nominated by **Bill Clinton** who allegedly had ties with Jeffrey Epstein. It was stipulated in the news media that Clinton flew with Epstein few times in his private jet. As such, Judge McMahon's bias posture cannot be surprise to Mr. Gueye.

II

### REQUEST FOR APPOINTMENT OF LEGAL COUNSEL

This case is written on behalf of poor African Children victims of Sex Crimes by some White so -called Billionaires and wealthy White folks. As such, Mr. Gueye who is simply an advocate in this case and a spokesperson hereby requests the appointment of a legal counsel one more time to successfully litigate this case. **Federal** district courts can **appoint lawyers** for plaintiffs in **civil** rights cases. This power comes from 28 U.S.C. §1915(e)(1), which reads in full, "The court may request an **attorney** to represent any person unable to afford **counsel**."

### Chapter 2, § 220: Appointment of Counsel | United States Courts

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### REQUEST FOR TRUST FUND FOR THE AFRICAN CHILDREN

Mr. Gueye hereby requests the Court to establish a trust fund that will be used to educate, inform African minors and to prevent future cases of sex trafficking of African Minors in the interest of Justice. Pursuant to 18 U.S.C. § 2265(b), If the order complies with the requirements set out in (1) and (2) above, the foreign order must be enforced. This is true even if the petitioner would not be eligible for relief in the enforcing state, tribe or territory or if the issuing state, tribe or territory granted types of relief that are not available in the enforcing jurisdiction.

### CONCLUSION

In conclusion, Mr. Gueye will not allow the club of Harvard crooked lawyers and crooked judges to play the same illegal and improper legal maneuvering they have cooked in Gueye v. U.S. Postal Services et al with only one appellate judge at the Second Circuit of New York to write some new laws in favor of their friends. That is not Justice.

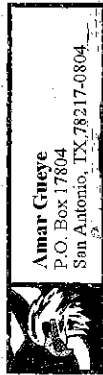
On the other hand, this case was never intended to humiliate any White wealthy pedophile. Its only goal is and will be to protect vulnerable African Children and to foster deterrence in the future as reiterated before. But should the court flip flop and further delays this case written since August 2019, a video will be broadcasted on youtube and all social media networks with all the close friends of Jeffrey Epstein who have participated in his international Sex trafficking. If this court has any sense of decency, it will peacefully resolve this matter the same way it resolved the cases of American girls, victims of Epstein's sex trafficking business in the interest of Justice. As for ADR, Mr. Gueye is all ears! Please pay Close Attention to this Memo for the sake of Peace & Justice!

Respectfully Submitted,

February 2, 2021

Mr. Amar Gueye P.O. Box 17804  
San Antonio, Texas 78217- Tel (206) 979-0094





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To: THE CLERK OF COURT

LETITIA JAMES

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
U.S. COURTHOUSE 500 PEARL ST  
NEW YORK, NY 10007

Pro Se

